

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF OHIO  
EASTERN DIVISION

FILED  
RICHARD W. NAGEL  
CLERK OF COURT

2021 JUN 23 PM 1:26

U.S. DISTRICT COURT  
SOUTHERN DIST. OHIO  
EAST. DIV. COLUMBUS

Ryan Towne,

Plaintiff

v.

Benefytt Technologies, Inc., et al

and

International Benefits Administrators, LLC,

Defendants

Case No. 2:21-cv-2990

Judge Sarah D. Morrison

Magistrate Judge Chelsey M.  
Vascura

**Plaintiff's Motion for Default Judgment against Defendant**  
**International Benefits Administrators, LLC**

I, Ryan Towne, Plaintiff, move this court for a judgment by default in this civil action against Defendant International Benefits Administrators, LLC (hereinafter "IBA"), pursuant to Fed. R. Civ. P. 55(b)(1). The complaint in the above case was filed in the Court of Common Pleas of Delaware County, Ohio on the 7<sup>th</sup> day of April, 2021, and the summons and complaint were duly served upon the Defendant IBA on the 14<sup>th</sup> day of April, 2021. No answer or other defense has been filed by Defendant IBA, and an Entry of Default was entered against IBA in the civil docket in this Office of the Clerk on the 17<sup>th</sup> day of June, 2021 as shown in Exhibit A. The Defendant is not in the military service and is not an infant or incompetent, as appears in the supported affidavit submitted herewith.

Wherefore, I, Ryan Towne, Plaintiff, move that this Court make and enter a Judgment against Defendant IBA in the total damages amount of \$80,843.

AFFIDAVIT

In support of my Motion for Default Judgment, I state that:

1. I, Ryan Towne, am the Plaintiff in this action.
1. The summons and complaint were served to Defendant IBA on 4/14/2021 at 100 Garden City Plaza Suite 110, Garden City, NY 11530 by personal service of the Nassau County Sheriff's Department. The Sheriff's Certificate of Service is attached hereto as Exhibit B.
2. Defendant IBA has failed to plead or otherwise defend, and the time given for IBA to answer or otherwise move has expired.

3. Defendant IBA is not an infant, incompetent person or a member of the military service.
4. This statement is true and is signed under the penalty of perjury.

I declare under penalty of perjury that the foregoing is true and accurate to the best of my knowledge, information and belief.

Dated 6/22/2021

A handwritten signature in black ink, appearing to read "R. Towner", is written over a horizontal line.


Ryan Towner, Plaintiff  
289 Lanthorn Pond Dr.  
Delaware, OH  
740-513-1033  
[cuattheshoe@me.com](mailto:cuattheshoe@me.com)

**Certificate of Service**

I, Ryan Towne, do hereby certify that on June 22, 2021, I mailed the foregoing document to Defendant IBA by regular mail to address 100 Garden City Plaza Suite 110, Garden City, NY 11530.

Respectfully Submitted,

Dated 6/22/2021

A handwritten signature in black ink, appearing to read "Ryan Towne", is written over a horizontal line.

Ryan Towne, Plaintiff  
289 Lanthorn Pond Dr.  
Delaware, OH  
740-513-1033  
cuattheshoe@me.com